ROBERT W. FREEMAN		
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Attorneys for Defendant		
Las Vegas Metropolitan Police Department		
UNITED STATES DISTRICT COURT		
DISTRICT OF NEVADA		

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	CASE NO. 2:24-cv-230-JAD-NJK	
	STIPULATION AND ORDER TO	
Plaintiff,	EXTEND DISCOVERY DEADLINES AND CONTINUE TRIAL	
vs.		
	[FIRST REQUEST]	
LAS VEGAS METROPOLITAN POLICE		
DEPARTMENT, a political subdivision of the		
Defendants.		
Pursuant to LR 6-1 and LR 26-3, the page 1	arties, by and through their respective counsel of	
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by ninety (90) days, up to and including Wedn	esday, October 30, 2024. In addition, the parties	
request that all other future deadlines contemplated by the Discovery Plan and Scheduling Order		
be extended pursuant to Local Rule. In support of this Stipulation and Request, the parties state as		
follows:		
1. On December 28, 2023, Plaintiff	filed his Complaint in the Eighth Judicial District	
Court, Nevada.		
	Nevada Bar No. 3062 Robert.Freeman@lewisbrisbois.com E. MATTHEW FREEMAN Nevada Bar No. 14198 Matt.Freeman@lewisbrisbois.com LEWIS BRISBOIS BISGAARD & SMITH LLP 6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118 702.893.3383 FAX: 702.893.3789 Attorneys for Defendant Las Vegas Metropolitan Police Department and Derrick Chandler UNITED STATES DISTRICT ** DANNY ALVAREZ RODRIGUEZ, an individual, Plaintiff, vs. LAS VEGAS METROPOLITAN POLICE DEPARTMENT, a political subdivision of the State of Nevada; DERRICK CHANDLER, an individual; DOES I-V, inclusive, Defendants. Pursuant to LR 6-1 and LR 26-3, the parecord, hereby stipulate and request that this Combination of the State of Nevada; Derrick Chandler stipulate and request that this Combination of the State of Nevada; Derrick Chandler state of Nevada	

LEWIS BRISBOIS BISGAARD & SMITH LLP ATTORNEYS AT LAW

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- 2. On February 1, 2024, Defendants removed the case to the United States District Court, District of Nevada.
- 3. On March 4, 2024, the Court entered the Discovery Plan and Scheduling Order.
- 4. On March 4, 2024 Plaintiff filed his First Amended Complaint.
- 5. On March 4, 2024, Plaintiff served his Initial FRCP 26 Disclosures.
- 6. On March 11, 2024, Defendants served their Initial FRCP 26 Disclosures.
- 7. On March 11, 2024, Defendants served their first set of written discovery on Plaintiff. Plaintiff served his responses on April 9, 2024.
- 8. On March 27, 2023, Plaintiff served written discovery on Defendants. Defendants responses are due on April 26, 2024.
- 9. On April 4, 2024, Defendants served their First Supplement to Initial FRCP 26 Disclosures.

DISCOVERY REMAINING

- 1. Defendants will finalize their responses to Plaintiff's initial sets of written discovery, and the parties will finalize any other remaining written discovery.
- 2. Defendants may depose Plaintiff.
- 3. Plaintiff may depose any named Defendant and/or Rule 30(b)(6) designee.
- Defendants will collect any and all relevant medical and/or mental health records and/or billing related to the allegations contained in Plaintiff's First Amended Complaint.
- 5. Defendants may depose Plaintiff's medical and/or mental health providers once able to collect any and all relevant medical and/or mental health records and billing.
- 6. The parties may depose any and all other witnesses identified through discovery.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

The parties aver, pursuant to Local Rule 26-3, that good cause exists for the requested extension. This Request for an extension of time is not sought for to delay the proceedings or for any improper purpose.

Counsel for Defendant is attending to family obligations involving medical issues over the

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next few months that will continue to require him to be out of the jurisdiction for extended periods of time. The obligation is unavoidable. For those reasons, the parties respectfully request an extension of the discovery deadlines in this matter.

Extension or Modification of The Discovery Plan and Scheduling Order. LR 26-3 governs modifications or extension of the Discovery Plan and Scheduling Order. Any stipulation or motion to extend or modify that Discovery Plan and Scheduling Order must be made no later than twenty-one (21) days before the expiration of the subject deadline and must comply fully with LR 26-3.

This is the first request for extension of time in this matter. The parties respectfully submit that the reasons set forth above constitute compelling reasons for the short extension.

The following is a list of the current discovery deadlines and the parties' proposed extended deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	Thursday, August 1, 2024	Wednesday, October 30, 2024
Deadline to Amend Pleadings or Add Parties	Wednesday, May 1, 2024	Tuesday, July 30, 2024
Expert Disclosure pursuant to FRCP26 (a)(2)	Friday, May 31, 2024	Thursday, August 29, 2024
Rebuttal Expert Disclosure pursuant to FRCP. 26(a)(2)	Monday, July 1, 2024	Monday, September 30, 2024
Dispositive Motions	Monday, September 2, 2024	Monday, December 2, 2024
Joint Pretrial Order	Wednesday, October 2, 2024	Tuesday, December 31, 2024 If dispositive motions are pending, the parties will submit their Joint Pretrial Order within thirty (30) days of the Court's order as to any dispositive motions.

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1	WHEREFORE, the parties respectfully request this Court extend the discovery period by		
2	ninety (90) days from the current deadline of August 1, 2024 up to and including October 30,		
3	2024, and extend the other dates as outlined in accordance with the table above.		
4	IT IS SO STIPULATED.		
5	DATED the 23 rd day of April, 2024.	DATED the $\underline{23^{rd}}$ day of April, 2024.	
6	BREEDEN & ASSOCIATES, PLLC	LEWIS BRISBOIS BISGAARD & SMITH, LLP	
7	<u>Adam J. Breeden</u>	/s/ Robert W. Freeman	
8	ADAM J. BREEDEN Nevada Bar No. 8768	Robert W. Freeman, Esq., Nevada Bar No.: 3062	
9	7432 W. Sahara Ave., Ste. 101 Las Vegas, Nevada 89117	E. Matthew Freeman, Esq., Nevada Bar No.: 14198	
10	Attorney for Plaintiff	6385 S. Rainbow Blvd., Ste. 600	
11		Las Vegas, Nevada 89118 Attorneys for Defendants	
12	ORDER		
13	IT IS SO ORDERED.	<u> </u>	
14	Dated: April 23, 2024		
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17	United States Magistrate Judge		
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